

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2021-143-E
DOCKET NO. 2021-144-E

Application of Duke Energy Progress,)	
LLC for Approval of Smart Saver Solar)	
as Energy Efficiency Program)	
)	PETITION TO INTERVENE
Application of Duke Energy Carolinas,)	
LLC for Approval of Smart Saver Solar)	
as Energy Efficiency Program)	

Vote Solar respectfully petitions the Public Service Commission of South Carolina (“Commission”) to intervene in the above-captioned dockets pursuant to R.103-825 of the Commission’s rules of practice and procedure. Southern Environmental Law Center (“SELC”) currently represents intervenors South Carolina Coastal Conservation League (“CCL”), Southern Alliance for Clean Energy (“SACE”), North Carolina Sustainable Energy Association (“NCSEA”), and Upstate Forever (“UF”) in these proceedings; if the Commission grants Vote Solar’s petition, SELC would jointly represent Vote Solar along with the above-listed parties. In support of this petition, Vote Solar states as follows:

1. On April 23, 2021, Duke Energy Carolinas, LLC’s (“DEC”) and Duke Energy Progress, LLC’s (“DEP”) (collectively, “Duke Energy” or “the Companies”) filed an application with the Commission for approval of the Smart Saver Solar Energy Efficiency Program (the “Program”) to be included in the Companies’ suite of energy efficiency and demand side management programs.

2. The Program is designed to reduce energy consumption by incentivizing the installation of rooftop solar at residential households. Specifically, the Program gives Duke Energy customers the option to earn an upfront incentive for installing rooftop solar if they also enroll in the winter-focused Power Manager Load Control Service Rider, known as Bring Your Own Thermostat (“Winter BYOT Program”). The Winter BYOT Program provides for winter-focused demand response and was previously approved in Order No. 2020-830.

3. The Program is the result of the same collaboration between the Companies, Vote Solar, and other intervenors, including CCL, SACE, UF, and NCSEA, that produced the Duke Energy solar choice tariff recently approved by the Commission in Docket Nos. 2020-264-E and 2020-265-E.

4. Vote Solar is a non-profit, grassroots organization that works to foster economic opportunity, promote energy independence for consumers, and address environmental concerns by making solar generation accessible and cost-effective for all Americans. Vote Solar works to bring solar into the mainstream by engaging at the local, state, and federal levels to help remove regulatory barriers and implement policies and programs to bring solar to scale. Established in 2002, Vote Solar has over 110,000 members nationally and more than 2,300 in South Carolina, including members who receive electricity service from Duke Energy and who will be directly impacted by the net metering and energy efficiency policies at issue in this proceeding. Commission approval of the Program will provide those members with an opportunity to reduce their energy consumption and utility bills. Vote Solar’s principal address is 360 22nd Street, #370, Oakland, CA 94612.

5. Vote Solar intervened and was an active participants in recent net metering dockets affecting the Duke Energy service territory, including Docket Nos. 2019-182-E, 2020-264-E, and 2020-265-E.

6. In this proceeding, Vote Solar will join CCL, SACE, UF, and NCSEA to advocate in support of Duke Energy's application to provide customers with improved access to rooftop solar and additional ways to reduce their energy consumption. More generally, Vote Solar seeks to promote innovative tariffs, as well as energy efficiency and demand side management programs, that reduce reliance on fossil fuels and support the expansion of renewable energy in South Carolina. Vote Solar's involvement in this docket supports clean energy decisions that will lead to cleaner, safer, and healthier communities for all South Carolinians.

7. Pursuant to R. 103-804(T) of the Commission's Rules of Practice and Procedure, the Petitioners are represented by counsel in this proceeding:

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WHEREFORE, Vote Solar respectfully requests that the Commission allow it to intervene as a party of record and participate fully in this proceeding.

Respectfully submitted this 15 day of July, 2021.

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*Counsel for Petitioner Vote Solar, as well as
intervenors CCL, SACE, UF, and NCSEA*

CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via first class U.S. Mail or electronic mail with a copy of the *Petition to Intervene* of Vote Solar.

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This 7th day of July, 2021.

S/Kate Lee Mixson